

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

**VINSON & ELKINS LLP**

Steven M. Abramowitz (No. 043641990)  
David S. Meyer (admitted *pro hac vice*)  
Lauren R. Kanzer (admitted *pro hac vice*)  
The Grace Building  
1114 Avenue of the Americas, 32nd Floor  
New York, New York 10036-7708  
Tel: (212) 237-0000  
Fax: (212) 237-0100  
Email: sabramowitz@velaw.com  
dmeyer@velaw.com  
lkanzer@velaw.com

-and-

William L. Wallander (*pro hac vice* pending)  
Matthew D. Struble (*pro hac vice* pending)  
2001 Ross Avenue, Suite 3900  
Dallas, Texas 75201  
Tel: (214) 220-7700  
Fax: (214) 220-7716  
Email: bwallander@velaw.com  
mstruble@velaw.com

*Counsel for Ad Hoc Group of Customers of Powin, LLC*

In re:

Powin, LLC, *et al.*,<sup>1</sup>

Debtors.

Case No. 25 – 16137 (MBK)

Chapter 11

(Jointly Administered)

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: (i) Powin, LLC [0504], (ii) PEOS Holdings, LLC [5476], (iii) Powin Project LLC [1583], (iv) Powin China Holdings 1, LLC [1422], (v) Powin China Holdings 2, LLC [9713], (vi) Charger Holdings, LLC [5241], (vii) Powin Energy Ontario Storage, LLC [8348], (viii) Powin Energy Operating Holdings, LLC [2495], (ix) Powin Energy Operating, LLC [6487]. The Debtors' mailing address is 20550 SW 115th Avenue Tualatin, OR 97062.

**APPLICATION FOR  
ORDER SHORTENING TIME FOR  
NOTICE OF MOTION FOR ENTRY OF AN  
ORDER AUTHORIZING AD HOC CUSTOMER GROUP  
TO REDACT AND FILE UNDER SEAL CONFIDENTIAL  
INFORMATION CONTAINED IN EXHIBITS IN CONNECTION  
WITH AD HOC CUSTOMER GROUP'S WITNESS AND EXHIBIT LIST**

---

Lone Star Solar, LLC,<sup>2</sup> Idaho Power Company, West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC<sup>3</sup> (each a “*Customer*,” and collectively, the “*Ad Hoc Customer Group*”), each a creditor, customer, and party in interest, by and through their undersigned counsel, hereby file this application (the “*Application*”) requesting that the time period to notice the *Motion for Entry of an Order Authorizing Ad Hoc Customer Group to Redact and File Under Seal Confidential Information Contained in Exhibits in Connection with Ad Hoc Customer Group’s Declarations and Witness and Exhibit List* (the “*Motion to Seal*”) be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because: The Motion to Seal seeks entry of an order (a) authorizing the Ad Hoc Customer Group to redact and file under seal certain (i) confidential information contained in exhibits within the Ad Hoc Customer Group’s witness and exhibit list for the hearing to be held on July 15, 2025 at 11:30 a.m. (ET) (the “*Witness and Exhibit List*”) and (ii) confidential contracts contained in exhibits within the Ad Hoc Customer Group’s declarations in support of the Adequate Protection Motion (defined below) (the “*Declarations*”); (b) directing the exhibits containing confidential information to remain under

---

<sup>2</sup> Lone Star Solar, LLC is a subsidiary of energyRe, LLC.

<sup>3</sup> West Warwick Energy Storage 1, LLC, West Warwick Energy Storage 2, LLC, and West Warwick Energy Storage 3, LLC are direct subsidiaries of Convergent West Warwick, LLC and indirect subsidiaries of Convergent Energy and Power LP.

seal and confidential and not be required to be made available to anyone, except to (i) the Court, (ii) the U.S. Trustee, (iii) counsel to the Debtors, and (iv) any other party as may be ordered by the Court or agreed to by the Ad Hoc Customer Group; and (c) granting related relief.

2. Shortened time is necessary because the relief sought in the Motion to Seal is directly related to the *Omnibus Motion of the Debtors for Entry of an Order (I) Authorizing the Rejection of Legacy Customer Contracts and (II) Granting Related Relief* [Docket No. 88] (the “**Rejection Motion**”) and the *Emergency Motion of Ad Hoc Customer Group for Entry of an Order (I) Granting Adequate Protection Under Section 363(e) of the Bankruptcy Code and (II) Granting Related Relief* [Docket No. 297] (the “**Adequate Protection Motion**”), which are set for hearing on July 15, 2025 at 11:30 a.m. (ET) and is necessary to protect the Ad Hoc Customer Group, the Debtors, and the Debtors’ estates from substantial harm as a result of disclosure of such confidential and commercially sensitive information.

3. The Ad Hoc Customer Group does not believe that any party in interest is prejudiced by this Application or the relief requested herein. The Ad Hoc Customer Group, through the Motion to Seal, is simply seeking the Court’s authorization to allow the Ad Hoc Customer Group to file the exhibits in connection with the Declarations and Witness and Exhibit List under seal to keep such confidential information contained in the exhibits from disclosure.

4. A hearing is requested on or before: The Ad Hoc Customer Group respectfully requests that the Court hear the Motion to Seal on July 15, 2025 at 11:30 a.m. (ET), or as soon as possible thereafter, but in any event prior to or contemporaneously with any hearing on the Rejection Motion and Adequate Protection Motion.

5. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1).

**WHEREFORE**, the Ad Hoc Customer Group respectfully requests entry of the proposed order shortening time, in substantially the form submitted herewith, granting the relief requested herein, and such other relief as is just and proper under the circumstances.

Dated: July 11, 2025  
New York, NY

/s/ Steven M. Abramowitz

**VINSON & ELKINS LLP**

Steven M. Abramowitz (NJ Bar No. 043641990)

David S. Meyer (admitted *pro hac vice*)

Lauren R. Kanzer (admitted *pro hac vice*)

The Grace Building

1114 Avenue of the Americas, 32nd Floor

New York, New York 10036-7708

Tel: (212) 237-0000

Fax: (212) 237-0100

Email: [sabramowitz@velaw.com](mailto:sabramowitz@velaw.com)

[dmeyer@velaw.com](mailto:dmeyer@velaw.com)

[likanzer@velaw.com](mailto:likanzer@velaw.com)

-and-

William L. Wallander (*pro hac vice* pending)

Matthew D. Struble (*pro hac vice* pending)

2001 Ross Avenue, Suite 3900

Dallas, Texas 75201

Tel: (214) 220-7700

Fax: (214) 220-7716

Email: [bwallander@velaw.com](mailto:bwallander@velaw.com)

[mstruble@velaw.com](mailto:mstruble@velaw.com)

*Counsel for Ad Hoc Group of  
Customers of Powin, LLC*